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Attorneys for the United States Trustee for Region 17
TRACY HOPE DAVIS

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

FLOYD E. SQUIRES, III and
BETTY J. SQUIRES.

Debtors.

Case No: 17-10828-WJL

Chapter 11

Date: Ex Parte; OST Requested
Time: Ex Parte; OST Requested

**DECLARATION OF TRIAL ATTORNEY JARED A. DAY IN SUPPORT OF
EX PARTE MOTION FOR ORDER SHORTENING TIME FOR HEARING ON
UNITED STATES TRUSTEE'S MOTION TO DISMISS OR CONVERT
UNDER 11 U.S.C. § 1112(b) ("MOTION")**

I, JARED A. DAY, declare as follows:

1. I am a Trial Attorney employed in the Reno, Nevada office of the United States Trustee for Region 17, which includes the Northern District of California. I have personal knowledge of the following unless stated to be on information and belief, and as to those matters, I believe them to be true. If called upon to testify, I could and would testify competently thereto.

2. The Office of the United States Trustee obtains information from bankruptcy

1 debtors regarding operating history, factors contributing to the bankruptcy filing, and the plan for
2 an effective reorganization. As part of that process, I reviewed the Debtors' Schedules,
3 Statements, and related documentation.

4 3. Debtors are required to supply the United States Trustee with certain documents
5 including proof of insurance for estate assets as prescribed by 11 U.S.C. § 1112(b)(4)(C) and the
6 United States Trustee Guidelines for Chapter 11 cases.
7

8 4. Failure to maintain appropriate insurance coverage that poses a risk to the estate
9 or to the public constitutes cause for dismissal or conversion under 11 U.S.C. § 1112(b)(4)(C)
10 and cause for a hearing on the matter on shortened time in this case.
11

12 5. No previous time modifications related to the United States Trustee's Motion
13 have been made in this case.
14

15 6. On February 20, 2018, I contacted, inter alia, counsel for the Debtors and counsel
16 for the City of Eureka to determine whether they are in agreement with the Motion being heard
17 on shortened time. A response has not been received by the United States Trustee as of the
date/time of the filing of this Declaration.
18

19 I declare under penalty of perjury that the foregoing is true and correct.
20

21 Dated: February 21, 2018

Respectfully Submitted,

22 By: /s/ Jared A. Day
23 JARED A. DAY
24 Trial Attorney for the United States Trustee
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